

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO FLORIDA WALGREENS SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendant Walgreen Co.¹ that, pursuant to the election of each Dismissing Plaintiff to participate in the Walgreens Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Walgreens Defendant (as defined in the footnote below) are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

¹ The Walgreens Settlement Agreement attached as Appendix B is between the State of Florida, Office of Attorney General on the one hand and Walgreen Boots Alliance, Inc. and Walgreen Co. on the other, but the Walgreens Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which include not only Walgreens Boots Alliance, Inc. and Walgreen Co. and other affiliated or related entities as defined in the Walgreens Settlement Agreement (“Walgreens Defendants”). Walgreens Settlement Agreement §§A(bb) & A(cc). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: June 29, 2022

Respectfully submitted,

Agreed as to form and substance:

/s/ Kaspar J. Stoffelmayr

Kaspar J. Stoffelmayr
Katherine M. Swift
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
(312) 494-4400
kaspar.stoffelmayr@bartlitbeck.com
kate.swift@bartlitbeck.com

*Attorneys for Defendants Walgreens
Boots Alliance, Inc., Walgreen Co., and
Walgreen Eastern Co.*

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)
ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
(561) 750-3000
(561) 750-3364 (Fax)
mdearman@rgrdlaw.com

*Counsel for Brevard County (1:19-op-45064-DAP)
Broward County (1:18-op-45332-DAP)
City of Pompano Beach (1:19-op-45087-DAP)
City of Coconut Creek (1:19-op-45089-DAP)
City of Delray Beach (1:18-op-45051-DAP)*

/s/ Thomas L. Young

Thomas L. Young (FL Bar No. 0231680)
LAW OFFICE OF THOMAS L. YOUNG, P.A.
3302 West Mullen Avenue
Tampa, FL 33609
(813) 251-9706
tyoung@tlylaw.com

Counsel for Polk County (1:18-op-45970-DAP)

/s/ Travis R. Walker

Travis R. Walker (FL Bar No. 36693)
THE LAW OFFICES OF TRAVIS R.
WALKER, P.A.
1100 SE Federal Highway
Stuart, FL 34994
(772) 708-0952
traviswalker@traviswalkerlaw.com

Counsel for City of Stuart (1:20-op-45124-DAP)

/s/ Peter J. Mougey

Peter J. Mougey (FL Bar No. 191825)
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN, BARR,
MOUGEY, P.A.
316 South Baylen Street
Pensacola, FL 32502
(850) 435-7000
pmougey@levinlaw.com

Counsel for Pasco County (1:18-op-45851-DAP)

/s/ Michael C. Moore

Michael C. Moore
MIKE MOORE LAW FIRM, LLC
P.O. Box 321048
Flowood, MS 39232
(601) 933-0070
mm@mikemoorelawfirm.com

Counsel for Hillsborough County (1:18-op-46281-DAP) and City of Tampa (1:18-op-46282-DAP)

/s/ James D. Young

James D. Young (FL Bar No. 567507)
MORGAN & MORGAN COMPLEX
LITIGATION GROUP
76 S. Laura Street, Suite 1100
Jacksonville, FL 32202
(904) 361-0012
(904) 366-7677 (Fax)
jyoung@forthepeople.com

Counsel for City of Deerfield Beach (1:19-op-45021-DAP)

City of Fort Lauderdale (1:18-op-46329-DAP)

City of Hallandale Beach (1:19-op-45119-DAP)

City of Lauderhill (1:18-op-45120-DAP)

*The County Commission of Monroe County
(1:19-op-45273-DAP)*

City of Orlando (1:20-op-45223-DAP)

City of Miramar (1:19-op-45088-DAP)

City of Pembroke Pines (1:18-op-46363-DAP)

/s/ Shayna E. Sacks

Shayna E. Sacks
NAPOLI SHKOLNIK, PLLC
360 Lexington Avenue, 11th Floor
New York, NY 10017
(212) 397-1000
ssacks@napolilaw.com

Counsel for Alachua County (1:18-op-45685-DAP)
Okaloosa County (1:19-op-45894-DAP)
Osceola County (1:18-op-45669-DAP)
Walton County (1:19-op-45423-DAP)

/s/ Keith Jackson

Keith Jackson
RILEY & JACKSON, P.C.
3530 Independence Drive
Birmingham, AL 35209
(205) 879-5000
(205) 879-5901(Fax)
www.rileyjacksonlaw.com

Counsel for the City of Lynn Haven (1:19-op-46006-DAP)

SO ORDERED this ___ day of June 2022.

Hon. Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)

ROBBINS GELLER RUDMAN

& DOWD LLP

120 East Palmetto Park Road, Suite 500

Boca Raton, FL 33432

(561) 750-3000

(561) 750-3364 (Fax)

mdearman@rgrdlaw.com